1 LAW OFFICE OF CLARK OVRUCHESKY Clark Ovruchesky, Esq. (301844) 2 co@colawcalifornia.com 3 750 B. Street, Suite 3300 San Diego, California 92101 4 Telephone: (619) 356-8960 5 Attorneys for Plaintiff, 6 Steve H. Koidal 7 UNITED STATES DISTRICT COURT 8 NORTHERN DISTRICT OF CALIFORNIA 9 10 STEVE H. KOIDAL, Case No.: 3:16-cv-0350-HSG 11 Plaintiff, JOINT MOTION AND 12 **PROPOSED** ORDER FOR v. 13 **EXTENSION OF TIME FOR** PARTIES TO FILE JOINT 14 AMERICAN HONDA FINANCE DISMISSAL IN RESPECT TO CORPORATION, TRAVIS 15 **DEFENDANT EXPERIAN** CREDIT UNION, WELLS FARGO INFORMATION SOLUTIONS, **AUTO FINANCE, INC., DELL** 16 INC. FINANCIAL SERVICES L.L.C., 17 CHASE BANK USA, N.A., HON. JUDGE HAYWOOD S. **EXPERIAN INFORMATION** 18 GILLIAM, JR. **SOLUTIONS, INC., EQUIFAX** 19 INFORMATION SERVICES LLC. 20 and TRANS UNION LLC., 21 Defendants. 22 23

Plaintiff Steve H. Koidal (hereinafter "Plaintiff") and Defendant Experian Information Solutions, Inc. (hereinafter "Experian") (jointly hereinafter referred to as "the Parties") are filing this motion to extend this Court's deadline of September 2, 2016 for the Parties to file a dismissal as to Defendant Experian (ECF No. 69).

The Parties have been working diligently to execute the written settlement agreement and fulfill their obligations under the settlement agreement. However, this process has taken longer than previously anticipated, but the Parties are confident that it will fully resolve by September 30, 2016. Therefore, the Parties respectfully request that this Court extend its deadline for the Parties to file a joint dismissal as to Defendant Experian to September 30, 2016.

DATED: September 2, 2016 Respectfully submitted,

LAW OFFICE OF CLARK OVRUCHESKY

By: /s/ Clark Ovruchesky
CLARK OVRUCHESKY, Esq.
ATTORNEY FOR PLAINTIFF

DATED: September 2, 2016 JONES DAY

By: /s/ Kelsey Israel-Trummel
Kelsey Israel-Trummel
Attorneys for Defendant,
Experian Information Solutions, Inc.

SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to all defense counsels listed above, and that I have obtained their authorizations to affix their electronic signatures to this document.

Dated: September 2, 2016 LAW OFFICE OF CLARK OVRUCHESKY

By: /s/ Clark Ovruchesky
Clark Ovruchesky
ATTORNEYS FOR PLAINTIFF

Case 4:16-cv-00350-HSG Document 71 Filed 09	/06/16 Page 3 of 4
PURSUANT TO THE JOINT MOTION, IT I Parties shall submit a Joint Dismissal as to Defend Solutions, Inc. by September 30, 2016.	
Date: 9/6/2016 HON: HAYWOO	DD S. GILLIAM, JR. ES DISTRICT JUDGE
	ES DISTRICT FODGE

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

CERTIFICATE OF SERVICE

Koidal v. American Honda Finance Corporation et al Case No: No: 16-cv-00350-HSG

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of San Diego, State of California, and not a party to the above-entitled cause.

On September 2, 2016, I served a true copy of:

STIPULATION AND [PROPOSED] ORDER OF DISMISSAL WITH PREJUDICE BETWEEN PLAINTIFF AND DEFENDANT TRAVIS **CREDIT UNION ONLY**

By ECF: On this date, I electronically filed the following [X]document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all other parties appearing on the docket sheet.

I declare under penalty of perjury that the above is true and correct (and that I am employed in or by the office of a member of the bar of this Court at whose direction the service was made).

Executed on September 2, 2016 San Diego, CA.

By: /s/ Clark Ovruchesky CLARK OVRUCHESKY, ESQ. ATTORNEY FOR PLAINTIFF

PROOF OF SERVICE